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**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
	§	<b>CASE NO. 18-33967 (BJH)</b>
<b>Senior Care Centers, LLC, <i>et al.</i>,<sup>1</sup></b>	§	
<b><i>Debtors.</i></b>	§	<b>(Joint Administration</b>
	§	<b>Requested)</b>

**LIST OF WITNESSES AND EXHIBITS FOR DECEMBER 7, 2023 HEARING**

Movants Benjamin Hanson, Brandon V. Hicks 2006 Trust, Jason Mabry 2006 Trust, KKR Debt Investors II (2006) (Ireland) L.P., KKR Financial Holdings III, LLC, KKR-Milton Capital Partners, LP, Kristen Hicks Hanson 2006 Trust, Lew Little, Jr., Oregon Public Employees Retirement Fund, Robert S. Hicks 2006 Trust, Robert S. Hicks, Shelly Ellard 2006 Trust, and St.

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<sup>1</sup> The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

Niklaas Healthcare, LP (collectively, “**Movants**”) hereby designate the following witnesses and exhibits (the “**Witness and Exhibit List**”) for the remote hearing scheduled on December 7, 2023 at 1:30 p.m. Central Standard Time before the Honorable Stacey G.C. Jernigan, United States Bankruptcy Court for the Northern District of Texas, regarding their Motion for Relief from the Automatic Stay to Permit Setoff of Mutual Debts (Dkt. 2311).

**WITNESSES**

- a. Edward McHorse by affidavit, or in person;
- b. Any person listed on the witness list of another party; and
- c. Any rebuttal and/or impeachment witnesses.

**EXHIBITS**

<b>Movant Exhibit No.</b>	<b>Description of Exhibit</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>
1	<b>Affidavit of Edward McHorse</b>			
2	<b>Membership Interest Purchase Agreement</b>			
3	<b>Any document or pleading filed in the above captioned case.</b>			
4	<b>Any exhibit necessary for impeachment and/or rebuttal purposes.</b>			
5	<b>Any exhibit identified or offered by another party.</b>			

Movants reserve the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing list of witnesses and exhibits as appropriate. Movants also reserve the right to rely upon and use as evidence (i) additional documents produced by the Debtor, (ii) exhibits included on the exhibit lists of any other parties in interest; and (iii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Respectfully submitted,

By: /s/ William H. Daniel  
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EMPLOYEES' RETIREMENT FUND,  
ROBERT S. HICKS 2006 TRUST,  
ROBERT S. HICKS, SHELLY ELLARD  
2006 TRUST, AND ST. NIKLAAS  
HEALTHCARE, LP

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was served on December 5, 2023, the date that this document was filed electronically. Service was accomplished by first class mail to the parties on the attached service list and also electronically to parties registered to receive notice via CM/ECF.

/s/ William H. Daniel

William H. Daniel